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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

DAVID SCHMITT, Individually and on  
behalf of all others similarly situated,

*Plaintiff,*

v.

MICRO FOCUS INTERNATIONAL PLC,  
CHRISTOPHER HSU, STEPHEN  
MURDOCH, MIKE PHILLIPS, KEVIN  
LOOSEMORE, NILS BRAUCKMANN,  
KAREN SLATFORD, RICHARD ATKINS,  
AMANDA BROWN, SILKE SCHEIBER,  
DARREN ROOS, GISELLE MANON, AND  
JOHN SCHULTZ,

*Defendants.*

Case No.: 18-cv-06763 (ALC)

ECF Case

**STIPULATION AND  
ORDER VACATING RESPONSE  
DEADLINES PENDING  
APPOINTMENT OF LEAD PLAINTIFF  
AND AMENDMENT OF COMPLAINT**

**WHEREAS** Plaintiff David Schmitt (“Plaintiff”) filed this action in the Northern District of California on May 23, 2018;

**WHEREAS** prior to being served with the Summons and Complaint, Defendants moved for transfer to this District under 28 U.S.C. § 1404(a) pursuant to the forum-selection clause in the Deposit Agreement that governs the American Depositary Shares upon which this action is based;

**WHEREAS** the parties thereafter stipulated to transfer to this District;

**WHEREAS** Movant Iron Workers’ Local No. 25 Pension Fund (“IWLPF”) has moved for appointment as Lead Plaintiff;

**WHEREAS** no other motions for appointment as Lead Plaintiff have been filed to date;

**WHEREAS** IWLPF anticipates that, if appointed as Lead Plaintiff, it will seek to file an amended complaint;

**IT IS HEREBY STIPULATED AND AGREED** between the undersigned counsel for Plaintiff David Schmitt, Movant Iron Workers’ Local No. 25 Pension Fund, and all Defendants as follows:

1. The undersigned counsel for Defendants hereby acknowledge and accept service of the summons and complaint in this action on behalf of the Defendants; provided, however, that the acceptance of service and entry into this Stipulation shall not waive, and Defendants expressly preserves, all rights, claims and defenses, including, but not limited to, all defenses relating to jurisdiction, other than a defense as to the sufficiency of service of the summons and complaints and the form of the summons;

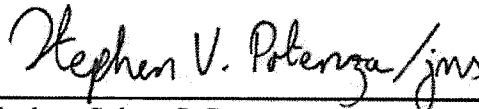
2. Defendants shall not be required to answer or otherwise respond to the Complaint until after a Lead Plaintiff has been appointed and either an Amended Complaint is filed or the Lead Plaintiff notifies Defendants that it does not intend to amend the complaint;

3. The parties will meet and confer regarding the timing of the filing of the Amended Complaint and briefing schedule for Defendants' anticipated motion to dismiss, and will submit to the Court a stipulation once they have reached agreement.

4. The parties reserve all other rights except to the extent specified in this Stipulation.

Dated: August 17, 2018

Respectfully submitted,

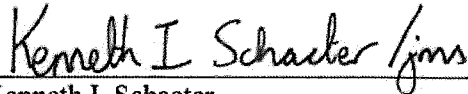
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Matthew Solum, P.C.  
Stephen V. Potenza  
Mark Salomon  
Joseph M. Sanderson  
**KIRKLAND & ELLIS LLP**  
601 Lexington Avenue  
New York, New York 10022  
Telephone: (212) 446-4800  
Facsimile: +1 212 446 4900  
Email: msolum@kirkland.com  
stephen.potenza@kirkland.com  
mark.salomon@kirkland.com  
joseph.sanderson@kirkland.com

Christopher W. Keegan (*pro hac vice*)  
Austin L. Klar (*pro hac vice*)  
**KIRKLAND & ELLIS LLP**  
555 California Street  
San Francisco, CA 94104  
Telephone: +1 415 439 1400  
Facsimile: +1 415 439 1500  
Email: chris.keegan@kirkland.com  
austin.klar@kirkland.com

*Counsel for Defendants Micro Focus  
International plc, Mike Phillips, Kevin  
Loosemore, Nils Brauckmann, Karen Slatford,  
Richard Atkins, Amanda Brown, Silke  
Scheiber, Darren Roos, and Giselle Manon*

Dated: August 17, 2018



Kenneth I. Schacter  
**MORGAN, LEWIS & BOCKIUS LLP**  
101 Park Avenue  
New York, NY 10178  
Telephone: (212) 309-6815  
Facsimile: (212) 309-6001  
Email: kenneth.schacter@morganlewis.com

Joseph E. Floren (*pro hac vice* pending)  
**MORGAN, LEWIS & BOCKIUS LLP**  
One Market, Spear Street Tower  
San Francisco, CA 94105  
Telephone: (415) 442-1391  
Facsimile: (415) 442-1001  
Email: joseph.floren@morganlewis.com

*Counsel for Defendant John Schultz*

Dated: August 17, 2018



Daniel J. Bergeson (*pro hac vice* to be filed)

John D. Pernick (*pro hac vice* to be filed)

Adam C. Trigg (*pro hac vice* to be filed)

**BERGESON, LLP**

111 N. Market Street, Suite 600

San Jose, CA 95113

Telephone: (408) 291-6200

Facsimile (408) 297-6000

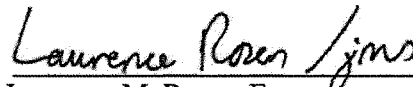
Email: dbergeson@be-law.com

jpernick@be-law.com

atrigger@be-law.com

*Counsel for Defendant Christopher Hsu*

Dated: August 17, 2018



Laurence M. Rosen, Esq.

**THE ROSEN LAW FIRM, P.A.**

275 Madison Avenue, 34<sup>th</sup> Floor

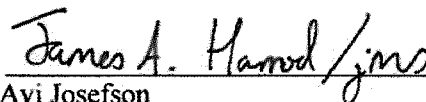
New York, NY 10016

Telephone: (212) 202-3827

Email: lrosen@rosenlegal.com

*Counsel for Plaintiff David Schmitt*

Dated: August 17, 2018



Avi Josefson

James A. Harrod

Michael D. Blatchley

**BERNSTEIN LITOWITZ BERGER**

**& GROSSMANN LLP**

1251 Avenue of the Americas

New York, New York 10020

Telephone: (212) 554-1400

Facsimile: (212) 554-1444

avi@blbglaw.com

jim.harrod@blbglaw.com

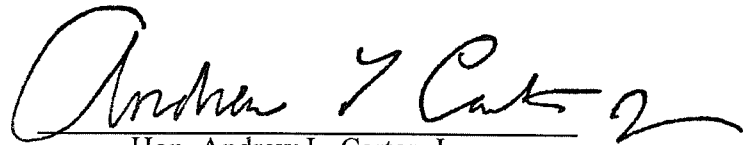
michaelb@blbglaw.com

*Counsel for Proposed Lead Plaintiff  
Iron Workers' Local No. 25 Pension Fund  
and Proposed Lead Counsel for the Class*

\* \* \*

**IT IS SO ORDERED.**

Date: September 10, 2018

A handwritten signature in black ink, reading "Andrew L. Carter, Jr.", written over a horizontal line.

Hon. Andrew L. Carter, Jr.  
United States District Judge